

JB

UNITED STATES DISTRICT COURT

for the

Northern District of ILLINOIS

Division

DOMONIQUE THORNHILL
DOMONIQUE M. THORNHILL

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TRANSUNION, LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

23cv4352

Cas Judge Shah
Magistrate Judge Finnegan
Randomly Assigned CAT 3Jury Trial: (check one) ☐ Yes ☐ No**FILED**

JUL 06 2023 JB

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DOMONIQUE THORNHILL
Street Address	IN CARE OF: 16965 JASMINE LANE
City and County	ORLAND HILLS, COOK COUNTY
State and Zip Code	ILLINOIS, 60487
Telephone Number	708-353-9010
E-mail Address	DOMONIQUEULLC@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	TRANSUNION, LLC
Job or Title <i>(if known)</i>	
Street Address	555 W ADAMS ST
City and County	CHICAGO; COOK COUNTY
State and Zip Code	ILLINOIS 60661
Telephone Number	855-681-3196
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1933 UNITED BANKRUPTCY ACT; 15 USC 1601 CONSUMER CREDIT COST DISCLOSURE; 18 USC 8 OBLIGATION AND SECURITIES OF THE UNITED STATES; 15 USC CHAPTER 41 CONSUMER CREDIT PROTECTION; 15 USC 1692 ABUSIVE DEBT COLLECTION PRACTICES; 15 USC 78m(Q)(1) (C)(I); 18 US CODE 241 CONSPIRACY AGAINST RIGHTS; 1026.23 RIGHT OF RESCSSION; 3-302 HOLDER IN DUE COURSE; 15 USC 1681A(K)(1) ADVERSE ACTION; THE MOROCCAN- AMERICAN

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* DOMONIQUE THORNHILL, is a citizen of the State of *(name)* THE UNITED STATES OF AMERICA.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

III. Statement Claim:

I affirm that now I am invoking my creditor status as a Federally Protected Consumer in fact, Original Creditor, Principal and Authorized Representative for DOMONIQUE THORNHILL. TRANSUNION LLC has attempted to extort and rob me using deceptive, misleading and abusive practices against me personally, my family and my household. TRANSUNION LLC have committed several violations against me, a Private law abiding Federally Protected Consumer. Each violation is a statutory cost of \$1000 each, which does not include my personal cost and fees(which I determine) for taking the time to address the issues.

Violations committed against me include but not limited to:

1. Violated 15 USC 1692c(a); Communication without prior consent, expressed permission.
2. Violated 15 USC 1692c(b); Communication without prior consent, expressed permission.
3. Violated 15 USC 1692d; Harass and oppressive use of intercourse about an alleged debt.
4. Violated 15 USC 1692d(1); Attacking my reputation, accusing me of owing an alleged debt to you.
5. Violated 15 USC 1692d(2) Use of obscene or profane language on my report(saying I owe a debt).
6. Violated 15 USC 1692e; Using false, deceptive or misleading representations.
7. Violated 15 USC 1692e(2)(a); False representation of the character and amount of alleged debt.
8. Violated 15 USC 1692e(2)(b); False representation of any service rendered or compensation.
9. Violated 15 USC 1692e(8); Communicating false information.
10. Violated 15 USC 1692e(9); Use/ distribution of communication without authorization or approval.
11. Violated 15 USC 1692e(10); False Representation (not a party to alleged debt by my consent).
12. Violated 15 USC 1692e(12); False Representation/ implication (innocent purchasers for value)
13. Violated 15 USC 1692f; Unfair Practices attempting to collect a debt.
14. Violated 15 USC 1692f(1); Attempting to collect a debt unauthorized by an agreement between parties.
15. Violated 15 USC 1692g(a)(4); Certifiable Validation and Verification of alleged debt(s).
16. Violated 15 USC 1692j(a,b); Furnishing certain deceptive forms.
17. Identity Theft; Obtaining personal identification information without prior consent and creating an account in my name without my knowledge.
18. Invasion of Individual and Family Privacy.

b. If the defendant is a corporation

The defendant, (name) TRANSUNION, LLC, is incorporated under the laws of the State of (name) ILLINOIS, and has its principal place of business in the State of (name) ILLINOIS.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
 For violations, I am assessing a penalty/fine of \$86,000 to be settled immediately.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I affirm that now I am invoking my creditor status as a Federally Protected Consumer in fact, Original Creditor, Principal and Authorized Representative for DOMONIQUE THORNHILL. TRANSUNION LLC has attempted to extort and rob me using deceptive, misleading and abusive practices against me personally, my family and my household. TRANSUNION LLC have committed several violations against me, a Private law abiding Federally Protected Consumer. Each violation is a statutory cost of \$1000 each, which does not include my personal cost and fees(which I determine) for taking the time to address the issues. Violations committed against me include but not limited to:

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

TransUnion LLC and affiliates has reported false/ negative information in my credit file. Between 01/03/2023 and 05/20/2023 numerous letters were sent and phone calls were made to TransUnion LLC to correct errors. TransUnion did not correct the requested errors and verified the errors through unknown illegal sources. My rights have been violated. These errors has caused me to lose funding that was available to me but was not given due to inaccurate information being reported in my credit file. I seek redress for actual damages and punitive damages in the amount of \$86,000. TransUnion and its representatives/ agents are Civilly Liable for frequented persistent

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07-06-2023

Signature of Plaintiff

Printed Name of Plaintiff

[Signature] W.P. UCC 1-308
DANIEL E. M. THORNHILL

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

DOMONIQUE THORNHILL

16965 Jasmine Lane
Orland Hills, IL 60487

Transunion
PO Box 2000
Chester, PA 19016-2000

Last 4 of Social Number: 6390

Attached is a copy of my credit report. Please add this consumer statement to my file.

I recently disputed inaccurate information that was reported in the credit file belonging to Domonique Thornhill. Listed below are accounts that I would like re investigated.

1. TBOM/ Fortiva, PO Box 105555, Atlanta GA 30348, 800-710-2961
Please provide source of verification for all accounts under this creditor

2. Navient, PO BOX 9500, WILKES BARRE, PA 18773, 888-272-5543
Please provide source of verification for all accounts under this creditor

3. Department of Education/Nelnet, PO BOX 82561, Lincoln, NE 68501, 888-486-4722
Please provide source of verification for all accounts under this creditor

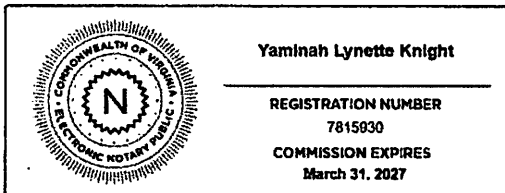
I received notice that Transunion verified each of these items on the credit file belonging to Domonique Thornhill. Some of the accounts were verified as accurate. I am requesting by mail a copy of the verification for each of these accounts. I am requesting that you send a signed contract with the signature of Domonique Thornhill and the other parties signature of contracts for each account that was disputed as verified as accurate in my credit file. I am requesting a copy of the surety bond that is on file with the note that is placed on the credit file belonging to Domonique Thornhill within 15 days from the date of this letter. I request that all erroneous inaccurate information be removed immediately. I'm requesting that Hard inquiry from Fortiva/ TBom be removed immediately. There are over 50 soft inquires on my file that i did not authorize. Remove all hard and soft inquires that violate my rights under the FCRA and if not removed I will seek damages against Transunion for reporting false information.

SIGNED,

W. DOMONIQUE THORNHILL

Domonique Thornhill
XXXXXX
05/23/2023
05/23/2023

Commonwealth of Virginia
County of Dinwiddie



The foregoing instrument was acknowledged before me
on 05/23/2023 by DOMONIQUE THORNHILL.

Yaminah Lynette Knight
Yaminah Lynette Knight
Electronic Notary Public

7815930

My commission expires: 03/31/2027

Notarized online using audio-video communication